



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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RCRA PERMITS SECTION

November 2, 1994

CERTIFIED MAIL

P 311 404 028

Mr. Keith Lund
Burlington Environmental Inc.
Technical Center
955 Powell Ave. SW
Renton, WA 98055-2908

Dear Mr. Lund:

Re: Interim Status Closure Plan for the Burlington Environmental
Inc. facility at Pier 91, WAD000812917

This correspondence is in response to the revised Interim Status
Closure Plan submitted to the Department of Ecology (Ecology)
dated July 1, 1994.

In summary, Ecology has determined that the closure plan needs
further revision before it can be public noticed and approved for
implementation. Most of the deficiencies listed in the April 28,
1994 notice of deficiency correspondence have been addressed by
Burlington Environmental Inc. (Burlington). However, additional
information and corrections are necessary in order to fulfill the
closure regulations under WAC 173-303-400 and by reference 40 CFR
Part 265. The specific deficiencies should be addressed by
written comments as well as actual changes in the closure plan.

Specific comments are attached that address the deficiencies.
Please make the appropriate revisions to the closure plan and
then re-submit to Ecology within 45 days of your receipt of this
letter.

Once the closure plan deficiencies are corrected, Ecology will
public notice the closure plan as submitted. At the end of the
public notice comment period, the closure plan could be modified
with conditions attached to its approval by Ecology (40 CFR
265(d)(4)) before the closure plan is approved for implementation
by Burlington.

USEPA RCRA



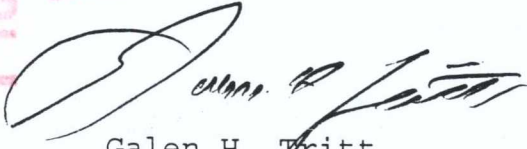
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If you have any questions or comments regarding these matters,
please contact me at (206) 649-7280.

Sincerely,



Galen H. Tritt
Hazardous Waste Specialist, NWRO

cc: Mike Torpy, Pacific Northern Oil Co. (PNO)
Doug Hotchkiss, Port of Seattle
David Croxton, EPA-X
Julie Sellick, WDOE-NWRO
D. Hideo Fujita, P.E., WDOE-NWRO
Byung K. Maeng, P.E., WDOE-NWRO
Jeannie Summerhays, WDOE-NWRO
Gerald Lenssen, WDOE-HQ
File HZW 5.1

BURLINGTON ENVIRONMENTAL INC.
PIER 91 FACILITY
RCRA Interim Status Closure Plan
November 2, 1994

COMMENTS ON EXISTING CLOSURE PLAN and REVISIONS REQUIRED

Burlington has added the closure of tanks 109, 110, 111 and 112 to the interim status closure plan. At present, these tanks are included within the final status permit and have been used to store regulated material. The issue is whether or not to close these tanks through interim status closure or partial closure under the existing final status Part B Permit. An argument could be made to close these tanks under either mechanism. Under the final status permit, these tanks could be closed under the existing approved closure plan. If these tanks are closed under interim status, the Part B Permit closure plan would need to be modified to account for the removal of these tanks from regulated service. Since the tanks were not upgraded as required under the Part B permit (upgraded by October 27, 1994), they could be considered interim status tanks. However, since the tanks were used under the final status permit, they could also be considered final status tanks.

- 1) Burlington should indicate their preferred mechanism for closure of these tanks. A detailed explanation of the rationale for the decision should be included in the correspondence not the closure plan.
- o If these tanks will be closed under interim status, make the necessary modifications to the Part B Permit and submit as permit modifications as required under WAC 173-303-830.
- o If these tanks will be closed under the Part B closure plan:
 - a) Changes to the interim status closure plan should be made to remove the tank descriptions included; and
 - b) Notification of partial closure should be sent to the Department and the requirements of final status closure initiated.

Burlington states that the present container storage area located within the warehouse has never been used to store hazardous waste for greater than 90 days. Within the 1988 RFA, a Burlington plant manager was stated to have "indicated that these particular hazardous wastes have been stored there for at least one year". Ecology personnel have inspected this area during compliance inspections and there are no major stains, cracks or other indications of spillage apparent at this time. The area under the warehouse will be addressed under the HSWA permit.

- 2) Burlington must provide documentation that this area has not been used for greater than 90 day storage of hazardous waste for Ecology not to require clean closure of this unit.

If Burlington is unable to provide this information, Ecology is open to alternative methods to deal with this issue. Such as:

- o modifications to the final closure plan to include this unit; and,
 - o including this unit within the interim status closure plan, steam cleaning and deferring any additional work until final closure since the unit is still used as an accumulation area.
- 3) Table 1-0 contains the closure cost estimates. This information should be updated to include up to date inflation information for 1993 and 1994.
 - 4) A post-closure plan is not required at this time. However, the wording within section 6.0 should be changed to include a contingency for one. It should be noted from your response to this item within your letter, that MTCA industrial cleanup standards may not be appropriate for this site. This would depending on if the site met all the necessary criteria under the MTCA regulations for this determination.